

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

REENA S. MATHEW,

Plaintiff,

v.

SANTANDER CONSUMER USA INC.,

Defendant.

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CIVIL ACTION NO. 3:23-CV-01494-N

DEFENDANT’S AMENDED EXHIBIT LIST

TO THE CHIEF UNITED STATES DISTRICT JUDGE DAVID C. GODBEY:

Pursuant to the Court’s Order Resetting Trial [Doc. No. 31], Defendant Santander Consumer USA Inc. (“Santander”) hereby submits the following Amended Exhibit List:

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
1	8/22/24	Declaration of Yessica Perez				
2	8/22/24	Declaration of Sabrina Boyd				
3	8/22/24	Declaration of Stephanie Elad				
4	8/22/24	Declaration of Tina Mohan				
5	3/2/22	Declaration of Fatma Rizvan	SC000165-166			
6	3/7/22	Declaration of Nicole Prior	SC000210-212			
7	3/7/22	Declaration of Christina Stout	SC000203-205			
8	3/7/22	Declaration of Whitney Andres	SC000167-169			
9	2013	Excerpts of Santander 2013 Associate Handbook	SC000860-906			
10	2015-2016	Santander You Earned It Tenure Audits	SC010411			
11	9/5/13	Instant Message Exchange Between Mathew and Hortensia Perez	SC011277-278			
12	2/14/14	Instant Message Exchange Between Mathew and Ms. Turilli	SC002847			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
13	3/13/14	Instant Message Exchange Between Mathew and Hortensia Perez	SC011279			
14	11/21/14	Instant Message Exchange Between Mathew and Ms. Turilli	SC002655			
15	12/1/14	Instant Message Exchange Between Mathew and Mr. Vinson	SC011280			
16	1/22/15	E-mail Exchange Between Ms. Elad and Ms. Turilli	SC001449-1450			
17	1/22/15	E-mail Exchange Between Mathew and Ms. Turilli	SC000042-43			
18	2/15-12/15	Addendum Timeline of Mathew Events	SC004172-4176			
19	4/1/15	Instant Message Exchange Between Mathew and Ms. Hullum	SC002732			
20	4/5/15	E-mail Exchange Between Ms. McDonnell and Ms. Hullum	SC000802-803			
21	4/3/15	E-mail Exchange Between Mr. Holt and Ms. Hullum	SC000810-814			
22	4/6/15	E-mail Message From Ms. Andres to Ms. Hullum	SC000799-800			
23	4/9/15	E-mail Exchange Between Mathew and Ms. Hullum	SC003720-3721			
24	4/9/15	E-mail Exchange Between Mathew and Ms. Hullum	SC003862-3863			
25	5/18/15	E-mail Message From Mathew to Ms. Hullum	SC003416			
26	12/17/15	E-mail Exchange Between Ms. Hullum and Ms. Lagunes	SC001332			
27	7/10/15	E-mail Exchange Between Mathew and Ms. Hullum	SC003731-3732			
28	8/12/15	E-mail Exchange Between Mathew and Mr. Wiener	SC003077-3079			
29	8/13/15	E-mail Message From Mathew to Ms. Hullum	SC004392-4393			
30	2/15/15	E-mail Exchange Between Ms. Perez and Ms. Malone	SC006276			
31	9/15-10/15	Mathew Outlook Calendar Invites to Ms. Perez	SC003002-3003, 3012-3013, 4180-4181, 4098-4099			
32	9/9/15	E-mail Message From Ms. Perez to Ms. Boyd, Mathew, and Ms. Perez	SC005719			
33	9/15	Ms. Hullum's 2015 Mid-Year Review of Reena Mathew	SC001484-1495			
34	9/17/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002656			
35	9/25/15	E-mail Message From Ms. Perez to Ms. Elad	SC007192			
36	10/29/15	E-mail Message From Ms. Perez to Ms. Elad	SC006640			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
37	10/29/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002730			
38	11/2/15	E-mail Message From Ms. Elad to Ms. Perez	SC007323			
39	11/16/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002773			
40	11/20/15	Instant Message Exchange Between Mathew and Mr. Dieckmann	SC010471			
41	11/20/15	E-mail Exchange Between Mathew and Ms. Boyd	SC011275-011276			
42	11/21/15	E-mail Message From Ms. Crouch to Ms. Kelch	SC009007-9008			
43	11/24/15	E-mail Exchange Between Ms. Elad and Ms. Perez	SC008392			
44	11/21/15	E-mail Message From Ms. Elad to Ms. Blackburn	SC001067			
45	11/24/15	E-mail Exchange Between Ms. Elad and Ms. Whatley	SC007514			
46	11/24/15	E-mail Exchange Between Ms. Elad and Ms. Perez	SC008392-8393			
47	11/25/15	E-mail Exchange Between Ms. Elad and Ms. Hanes	SC009619-9620			
48	12/1/15	Santander Consumer USA, Inc. Performance Improvement Plan	SC005409-5412			
49	12/8/15	E-mail Exchange Between Ms. Perez and Ms. Elad	SC006128-6129			
50	12/10/15	E-mail Message From Ms. Elad to Ms. Blackburn	SC001120-1121			
51	12/10/15	E-mail Message From Ms. Hullum to Ms. Elad	SC001118, 1152			
52	12/15/15	E-mail Message From Ms. Perez to Ms. Elad	SC005429-5431			
53	12/22/15	E-mail Exchange Between Mr. Shaffer and Ms. Elad	SC000004-5			
54	12/28/15	E-mail Exchange Between Mathew and Ms. Perez	SC004058-4060			
55	12/31/15	E-mail Exchange Between Ms. Blackburn and Ms. Elad	SC000014-15			
56	1/13/16	E-mail Exchange Between Ms. Perez and Ms. Elad	SC000009			
57	2016	Santander Consumer USA, Inc. 90 Day Performance Improvement Plan	SC000708-716			
58	1/18/16	E-mail Exchange Between Ms. Elad and Ms. Perez	SC001053-1054			
59	1/27/16	E-mail Message from Mathew to Mathew	SC002926-2932			
60	1/27/16	E-mail Exchange Between Mathew and Mr. Shaffer	SC005140-5145			
61	2016	Mr. Shaffer Final Report of Reena Mathew	SC000021-30			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
62	2/1/16	E-mail Message from Mathew to Ms. Perez	SC004104			
63	2/15-12/15	Addendum Timeline of Events - Mathew	SC004172-4176			
64	2/23/16	E-mail Exchange Between Ms. Elad and Mathew	SC001047-1049, 9650-9652			
65	3/29/16	E-mail Exchange Between Ms. Elad and Ms. Hanes	SC000931-933			
66	4/14/16	E-mail Exchange Between Mr. Shaffer and Ms. Elad	SC008785-8786, 717-719			
67	11/24/15	Instant Message Exchange Between Mathew and Ms. Perez	SC002752			
68	3/28/16	E-mail Exchange Between Ms. Perez and Ms. Elad	SC006633-6634			
69	3/21/16	E-mail Exchange Between Ms. Perez and Ms. Hanes	SC005961-5962			
70	2013	Santander Consumer USA, Inc. Progressive Discipline Policy 2013	SC010464-10470			
71	1/18/16	E-mail Exchange Between Ms. Hullum and Ms. Elad	SC001105-1107			
72	10/11/24	Declaration of Sabrina Boyd				
73	2012	R. Mathew's 2012 Annual Objectives	SC000987-990			
74	7/30/15	E-mail message from R. Mathew to A. Hullum	SC000837			
75	8/24/15	HR Org. Change Announcement from S. Elad	SC008380-8381			
76	11/23/15	E-mail message from R. Mathew to Y. Perez	SC004226-4227			
77	11/24/15	E-mail message from R. Mathew to Y. Perez	SC004491-4492			
78	1/11/16	E-mail message exchange between S. Elad, S. Shaffer, A. Hullum, and Y. Perez	SC008177-8179			
79	3/8/16	Instant Message Exchange Between R. Mathew and S. Boyd	SC001799-1802			
80	4/8/16	E-mail message from R. Mathew to Y. Perez	SC004212-4213			
81	1/18/16	E-mail to Stephen Shaffer from Reena Mathew	SC004169-4176			
82	9/14/15	Event: One on One	SC002358			
83	3/10/16	E-mail to Reena Mathew from Yessica Adriano, Subject: FW: Investigation Summary-Jacqueline M. Smith	SC005273-5275			
84	4/1/24	Plaintiff's Amended Answers to Defendant's First Set of Interrogatories				
85	2015	Activity at a Glance	SC000852-853			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
86	11/5/15	E-mail to yadriano from YouEarnedIt	SC007909-007910			
87	3/3/2015	E-mail to Angeline Hullum from Reena Mathew, Subject: RE: Annette Williams	SC000018			
88	7/2/2015	E-mail dated to Hortensia Perez from Yessica Adriano, Subject: RE: Associate Cedric Phillips	SC005321-323			
89	11/18/2015	E-mail dated to Yessica Adriano from Angeline Hullum, Subject: RE: Reena and Sabrina Annual Review	SC009280			
90	12/8/2015	E-mail 2015 to Yessica Adriano from Jeffrey Wiener, Subject Summary of HR Conversation	SC007933-934			
91	12/10/2015	E-mail to Stephanie Elad from Yessica Adriano, Subject: FW: Leave Early Requests	SC001119			
92	8/20/13	Instant message exchange from Mathew to Ms. Hullum	SC002616			
93	11/16/15	Instant message exchange from Mathew to Ms. Perez	SC0011282			
94	9/5/13	Instant message exchange from Mathew to Hortensia Perez	SC011277-278			
95	1/1/14	Instant message exchange from Mathew to Mr. Vinson	SC011280			
96	3/22/16	E-mail exchange between Ms. Perez and Mathew	SC005740-741			
97	3/11/16	E-mail exchange between Ms. Elad and Mathew	SC002071-2072			
98	3/24/16	E-mail exchange between Mathew and Ms. Perez	SC006355-6356			
99	4/19/16	E-mail message from Ms. Blackburn to Mr. Shaffer	SC001738-1739			
100	4/1/16	Instant message exchange between Mathew and Ms. Boyd	SC002901-2905			
101	4/18/16	E-mail message from Ms. Perez to Ms. Elad	SC005630			
102	4/19/16	E-mail exchange including e-mail messages in which Mathew sent to Ms. Blackburn, Mr. Burns and to her personal e-mail account and attachments	SC003542-3543, 3552, 3553, 3544, 2027, 2177, 4234, 4245, 4212, 3190, 3556, 3133			
103	2014	Santander's Information Security Policy	SC004548-4557			
104	1/28/16	E-mail message from Mathew to her personal e-mail address	SC003062			
105	2015	Mathew's 2015 Annual Performance Review	SC000936-000943			
106	2024	No records affidavit for Mathew's Baylor Scott & White	SC011292-303			

EXH NO.	DATE	DESCRIPTION	BATES	OFF.	OBJ.	ADM.
		Obstetrics & Gynecology – Frisco medical records				
107	2024	No records affidavit for Mathew’s Baylor Scott & White Obstetrics & Gynecology – Frisco billing records	SC011304-314			
108	2024	Mathew’s medical records from Baylor Scott & White Dallas Diagnostic Association - Plano	SC011330-397			
109	5/5/16	Facebook messages between Mathew and Heather Hutto-Leon	Mathew 336-338			
110	2016-2019	Facebook messages between Mathew and Demetrice Vasquez-Patton	Mathew 340-43			
111	8/28/16	Facebook messages between Mathew and Lyndy Parnell	Mathew 355-356			
112	5/12/16	Texas Workforce Commission Unemployment Benefits file of Mathew	Mathew 209-250			
113	1/18/16	E-mail message from Mathew to her personal e-mail address	Mathew 011			
114	1/18/16	E-mail message from Mathew to her personal e-mail address	Mathew 012-013			
115	12/8/15	E-mail message from Mathew to her personal e-mail address	Mathew 014-015			
116	12/6/15	E-mail message from Mathew to her personal e-mail address	Mathew 017-018			
117	12/1/15	E-mail message from Mathew to her personal e-mail address	Mathew 023-024			
118	12/5/15	E-mail message from Mathew to her personal e-mail address	Mathew 028-029			
119	1/19/16	E-mail message from Mathew to her personal e-mail address	Mathew 042-044			
120	2/19/16	E-mail message from Mathew to her personal e-mail address	Mathew 087-089			
121	3/1/16	E-mail message from Mathew to her personal e-mail address	Mathew 090-091			
122	2011-2016	Demonstrative exhibit regarding the timeline of events related to Mathew’s employment				
123		Demonstrative exhibit regarding “You Earned It” points				
124		Demonstrative exhibit regarding the business organization of Santander’s HR department				
125		The entire EEOC file ¹				

¹ Santander only offers this exhibit for the purpose of optional completeness should the Court deny Santander’s Motion in Limine as to the EEOC Conciliation of Failure and Notice of Rights Letter (Ex. 156) and the EEOC Determination (Ex. 155). If the Court grant’s Santander’s Motion in Limine, Santander does not intend to seek to admit this exhibit for trial.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On February 21, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served Plaintiff's counsel as follows electronically or by another manner authorized by Rule 5(b)(2) of the Federal Rules of Civil Procedure:

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